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SENDER:	Konrad Chan, Esq.	RECEIVER FAX NO: (571) 273-8300
RECEIVER:	Examiner Bharat Barot	OUR FILE REF: SONYP009
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Message:

Dear Mr. Barot:

Attached please find our Response to Arguments.

Best regards,

A handwritten signature in black ink, appearing to read 'K Chan'.

Konrad Chan

Appl. No. 09/846,115

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PATENT

JUN 13 2006

**FOR EXAMINER CONFERENCE CALL DISCUSSION****ONLY.****ATTN: EXAMINER BHARAT BAROT****Please call Applicant's Attorney:****Konrad Chan at (408)774-6911****June 13, 2006****Response to Arguments**

In response to Examiner's arguments on Page 6 of the Office Action mailed March 30, 2006, please note that Dietz does not teach all of the claimed elements of Applicant's invention. Although there are other differences, one difference is that Dietz fails to teach the application of an *expression* to the content data. The cited portions of Dietz particularly reference the ability to translate languages and do not teach the application of an expression as claimed.

Applicant's claimed invention identifies an *expression* to be applied to the content data. The term "expression" is in no way analogous to the term "translate". Taking the broadest interpretation or definition of translate would still not cover the claimed application of expression. Without the use of extrinsic evidence or referencing the specification, the definition of "expression", as found in the claims, cannot be covered by the term "translate" as taught by Dietz. This is because even broadly defined, "translate" means "to convert" which is wholly incongruous with the term "expression".

Attorney Docket No. SONYP009

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